

From: Mia, Marcia

Sent: Monday, October 30, 2017 02:04 PM

To: Hambrick, Amy; augustine, bruce; Marsh, Karen

Subject: RE: Fw: NSPS Quad O/Oa questions **Ex. 5 Deliberative Process (DP)**

Calling in a minute.

Marcia B Mia

Office of Compliance/Air Branch

2227A WJCS

U.S. Environmental Protection Agency

202-564-7042

-----Original Appointment-----

From: Hambrick, Amy

Sent: Tuesday, October 24, 2017 6:49 PM

To: Hambrick, Amy; augustine, bruce; Marsh, Karen; Mia, Marcia

Subject: Fw: NSPS Quad O/Oa questions **Ex. 5 Deliberative Process (DP)**

When: Monday, October 30, 2017 10:00 AM-10:30 AM (UTC-05:00) Eastern Time (US & Canada).

Where: **Ex. 5 Deliberative Process (DP)**

Let's touch base so we can all close this one out. Probably won't need the whole hour.

Amy

Hi Amy and Bruce,

See my thoughts below.

Karen R. Marsh, PE

US EPA, OAQPS, Sectors Policies and Programs Division

Fuels and Incineration Group

109 TW Alexander Drive, Mail Code E143-05

Research Triangle Park, NC 27711

Direct: (919) 541-1065; email: marsh.karen@epa.gov

From: Hambrick, Amy

Sent: Monday, October 16, 2017 11:03 AM

To: augustine, bruce <augustine.bruce@epa.gov>; Marsh, Karen <Marsh.Karen@epa.gov>

Subject: Fw: NSPS Quad O/Oa questions

Bruce-- In efforts to coordinate on these questions that Kris sent both of us, please see some of my initial thoughts in red in the below email chain. I am also cc'ing Karen

Marsh the fugitives contact for the rule for input on the last question. After we are in agreement with the responses, please let me know how you prefer to get back to Kris (e.g, do you want to send the response or have the response come from OAQPS?).

Thanks,

Amy

From: augustine, bruce

Sent: Tuesday, October 10, 2017 4:29 PM

To: Hambrick, Amy <Hambrick.Amy@epa.gov>

Subject: OOOOa questions

Amy,

Im not sure if you saw the email from CEC consultants with the questions on OOOO/OOOOa? Maybe we can discuss their questions and EPA's response? I'm a little confused as to whether they think a site is subject to OOOO, OOOOa or both. Lets make sure we're on the same page with respect to a response. Thanks

Bruce J. Augustine

Environmental Scientist

Office of Air Enforcement & Compliance Assistance

USEPA Region III

1650 Arch Street

Mailcode: 3AP20

Philadelphia, PA 19103

(215) 814-2131

From: Macoskey, Kris [mailto:kmacoskey@cecinc.com]

Sent: Tuesday, October 10, 2017 4:11 PM

To: augustine, bruce <augustine.bruce@epa.gov>; Hambrick, Amy <Hambrick.Amy@epa.gov>

Cc: Blasingame, Ben <bblasingame@cecinc.com>

Subject: RE: NSPS Quad O/Oa questions

Hi Bruce,

Thanks for the quick reply.

We've interpreted "well site" to be different from "well affected facility." So, while 60.5365a(a) establishes "well affected facility" as being connected to fracturing, the definition of "well site" in 60.5430 does not. 60.5430 even says "any oil well" in the definition. And, since the fugitive emissions component affected facility discussion in 60.5365a(i)(2) includes the term "well site," we've understood that fugitives at any well need to be accounted for if they meet the definition of "fugitive emissions components."

It that's incorrect, can you point me to some source of clarification?

Thanks,

Kris

Kristian A. Macoskey, QEP

Senior Air Quality Consultant / Vice President

Civil & Environmental Consultants, Inc.

333 Baldwin Road · Pittsburgh, PA 15205-1751

Toll-Free: (800) 365-2324 · Direct: (412) 249-3147 · Fax: (412) 429-2114

Mobile: (412) 398-3927 · <http://www.cecinc.com>

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From: augustine, bruce

Sent: Tuesday, October 10, 2017 4:03 PM

To: Macoskey, Kris <kmacoskey@cecinc.com>; Hambrick, Amy <Hambrick.Amy@epa.gov>

Cc: Blasingame, Ben <bblasingame@cecinc.com>

Subject: RE: NSPS Quad O/Oa questions

Kris,

Thanks for the email. With respect to Q5, I think you indicated that the well was not hydraulically fractured? If that's the case, I don't think its an affected facility under 60.5365a(a). Maybe we can discuss this further?

Bruce J. Augustine

Environmental Scientist

Office of Air Enforcement & Compliance Assistance

USEPA Region III

1650 Arch Street

Mailcode: 3AP20

Philadelphia, PA 19103

(215) 814-2131

From: Macoskey, Kris [<mailto:kmacoskey@cecinc.com>]

Sent: Tuesday, October 10, 2017 3:12 PM

To: Hambrick, Amy <Hambrick.Amy@epa.gov>; augustine, bruce <augustine.bruce@epa.gov>

Cc: Blasingame, Ben <bblasingame@cecinc.com>

Subject: NSPS Quad O/Oa questions

Hi Amy - thanks for the VM. As suggested, please see our questions:

Also, Bruce - I've included you here since Amy suggested we get your opinion on Item 5.

Thank you both for your help!

1. Is the reporting period for the first annual report under 0000a 10/31/17?

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2. Is the reporting period for that annual report 8/2/16 through 8/1/17?

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3. Do facilities subject only to 0000 continue to report according to the 10/15/16 to 10/14/17 reporting period (due date 90 days after the reporting period ends so 1/15/18 (since the 13th is on a Saturday).

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4. Where do activities subject to 0000a that occurred between the start of 0000a (9/18/15) and 8/2/16 get reported or are they excluded from reporting?

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5. Bruce - can you provide a determination as to the applicability of the 0000a fugitive emissions component LDAR monitoring to the flowlines attached to the wellhead in the attached photo? This is a shallow vertical well (not fracked) that produces oil/gas. Our interpretation is that this is an affected facility under §60.5365a(i) that's subject to LDAR (non-wellhead equipment would be the pipes and fittings attached to the wellhead valves are applicable). As such, a plan and measurements would be needed for those two short segments of pipe and the associated fittings. Does US EPA agree with that interpretation?

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